



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

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Ref: 8EPR-N

Rhonda O'Byrne
District Ranger
Northern Hills Ranger District
2014 North Main Street
Spearfish, SD 57783

RE: West Rim Project, Draft
Environmental Impact Statement
CEQ# 20080218

Dear Ms. O'Byrne:

The Environmental Protection Agency (EPA) Region 8 Office has reviewed the Draft Environmental Impact Statement (DEIS) for the West Rim Project on the Black Hills National Forest (BHNF). The EPA reviews EISs in accordance with its responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Section 309 of the Clean Air Act directs EPA to review and comment in writing on the environmental impacts of any major federal agency action. The EPA's comments include a rating of the environmental impact of the proposed action and the adequacy of the NEPA document.

The proposed action includes a variety of vegetation treatments and expansion of a transportation system to provide access to treatments. Within the project area, this includes commercial timber harvest on 13,379 acres, non-commercial harvest on 13,713 acres, prescribed burning on 13,226 acres and fuel reduction treatments on 468 acres. The project also includes construction of 35 miles of new roads, and reconstruction of 126 miles of existing roads necessary to access timber stands. The DEIS states that all new roads built for this project would likely be closed following harvest activities, and that road closure decisions will be made by the Travel Management Plan currently underway. The key issue identified as the focus for the project is fuel reduction in Spearfish Canyon, specifically in the wildland urban interface (WUI).

EPA is primarily concerned about impacts to water quality, aquatic resources and wildlife habitat from new road construction and the associated harvest activities. We are

concerned that the transportation system is being expanded at the same time Forest Service road maintenance budgets are being reduced. Inadequate management and maintenance of the existing system and non-system roads can damage water, soil and habitat resources. EPA is particularly concerned that decisions about where to expand the road network have been made prior to completion of slope stability surveys. According to the DEIS, the West Rim project area is located in areas marked by steep to very steep sideslopes, narrow valley bottoms and degraded stream channel conditions (page 195). Furthermore, all eight timber sale units surveyed during the soil health assessments were considered “at risk” for soil erosion. Map A-3 identifies the network of proposed new roads. Due to the steep topography of this project area, EPA recommends that the Forest Service complete and consider the results of slope stability surveys prior to identifying an expanded transportation network for new treatments.

The DEIS states that Lower Spearfish Creek, Cleopatra Creek and Iron Gulch are Class III watersheds of “high concern.” These are watersheds in which “management activities must be done with great care” and watershed improvement activities must be part of project planning. (page 199). While the maps show extensive road construction, clearcutting, thinning and fuels treatment in those areas, the DEIS does not include any information on watershed improvement activities. This appears inconsistent with the BHNF’s requirement that management activities in Class III watersheds can only occur if they do not degrade the watershed further (page 200). The FEIS should include the best management practices and mitigation commitments that will describe how overall improvement of watershed conditions can be expected to be achieved along with the proposed treatments.

EPA would like to have seen an alternative that limited management actions to those areas accessible by the current road system. The West Rim ID team did not consider an alternative that avoids new road construction, and instead proposes adding 35 miles of new road to the transportation system. The DEIS also states that no roads are proposed for decommissioning because the BHNF is currently in the process of revising its Travel Management Plan, which will identify which routes are necessary and what uses will be allowed on them. The Travel Management Plan will supersede any decisions made at the project level (page 34). It is unclear how these proposed new roads will be incorporated into the current Travel Management Planning process. As the DEIS states, roads are considered the primary contributors of sediments to streams in managed watersheds (page 202). Roads also contribute to increased stream siltation, mass movement and erosion, damaged plant habitat and increased wildlife habitat fragmentation. EPA recommends that the Forest Service consider an alternative that does not expand the existing transportation system until the Travel Management Planning Process is finished. Management activities could instead be intensified in areas already accessible by existing roads.

EPA evaluates the potential effects of proposed actions and the adequacy of the information in the DEIS. We rate this DEIS an “EC-2” (environmental concerns, insufficient information) under EPA’s enclosed ratings criteria. The EC rating indicates that the reviewer has identified environmental impacts that should be avoided in order to adequately protect the environment. The EC rating is based on EPA’s concerns regarding the potential adverse impacts to water quality, soil erosion and wildlife habitat from the Proposed Action. The potential for

significant environmental degradation can be reduced by modifying the project to 1) eliminate or reduce the miles of new road construction and 2) include watershed improvement activities and mitigation commitments in Class III watersheds. The “2” rating means that the DEIS lacked sufficient information and analysis of an alternative that could achieve the fuel reduction goals in Spearfish Canyon while minimizing or fully mitigating the adverse impacts to water, soil, wildlife and other resources. Impacts to those resources should be quantified and better described in the FEIS. A copy of EPA's rating criteria is attached.

EPA appreciates the opportunity to review and comment on the DEIS and your willingness to consider our comments at this stage of your planning process. If we may provide further explanation of our concerns please contact Jody Ostendorf of my staff at 303 312-7814, or me at 303 312-6004.

Sincerely,

/s/ *Deborah Lebow-Aal*
for Larry Svoboda
 Director, NEPA Program
 Ecosystems Protection and Remediation

Enclosure:

Ratings criteria